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Attorneys for Defendant
 WESTERN STATES CONTRACTING, INC.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JAY COLLINS,)	Case No.: 2:20-cv-00302-JAD-NJK
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	EXTEND DISPOSITIVE MOTION
vs.)	DEADLINES
)	
WESTERN STATES CONTRACTING,)	(SECOND REQUEST)
INC, a Nevada corporation; AND DOES)	
1-50, inclusive,)	
)	
Defendants.)	

IT IS HEREBY STIPULATED and agreed between Plaintiff JAY COLLINS (“Plaintiff”), through his counsel, Watkins & Letofsky, LLP, and Defendant WESTERN STATES CONTRACTING, (“Defendant” or “Western”), through its counsel, Fisher & Phillips LLP, as follows:

1. On June 9, 2020, the Court entered Scheduling Order granting Discovery Plan submitted by the parties. ECF No. 16.
2. The current deadline to file dispositive motions (November 1, 2021), be extended thirty (30) days to December 1, 2021. The extension is necessary because Defendant’s counsel has been handling an unexpected emergency involving a pro bono

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1 client in foster care who requires special placement and medical treatment necessitating
2 court action and also because counsel has recently acquired multiple other cases
3 resulting from the resignation of a colleague.

4 3. This stipulation and order is sought in good faith and not for the purpose
5 of delay.

6 Dated this 28th day of October, 2021.

7 WATKINS & LETOFSKY, LLP

FISHHER PHILLIPS LLP

8
9 /s/ Daniel Watkins

/s/ Lisa A. McClane

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13 Attorney for Plaintiff
14 JAY COLLINS

Attorneys for Defendant
WESTERN STATES CONTRACTING,
INC.

15 **ORDER**

16 **IT IS SO ORDERED.**

17
18 
19 United States ~~District Court~~ Magistrate Judge

20 Dated: October 28, 2021
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